

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

ROBERT T. BROCKMAN,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. 4:22-cv-00202-GCH
	§	
UNITED STATES OF AMERICA,	§	
	§	
Defendant.	§	

**August 12, 2022 DECLARATION OF KATHRYN KENEALLY**

I, Kathryn Keneally, declare as follows:

1. I am a member of the bar of the State of New York. I am a partner of the law firm Jones Day, counsel for Plaintiff Robert T. Brockman. I make this Declaration in support of Plaintiff Robert T. Brockman's Third Supplemental Memorandum in Support of Motion for Determination on Complaint for Judicial Review and Abatement of Jeopardy Assessment.
2. Attached hereto as Exhibit A is a copy of an Internal Revenue Service Account Transcript for Robert T. Brockman's Form 1040 for his tax period ending December 31, 2004. This exhibit attached hereto has been redacted in compliance with Federal Rule of Civil Procedure 5.2.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in New York, New York on August 12, 2022.

/s/ Kathryn Keneally  
Kathryn Keneally

## Exhibit A



This Product Contains Sensitive Taxpayer Data

# Account Transcript

Request Date 08 05 2022  
Response Date: 08-05-2022  
Tracking Number [REDACTED]

FORM NUMBER: 1040  
TAX PERIOD: Dec. 31, 2004

TAXPAYER IDENTIFICATION NUMBER: [REDACTED]

SPOUSE TAXPAYER IDENTIFICATION NUMBER: [REDACTED]

ROBE T BROC

670	Payment Levy	11-17-2021	-\$500,044.98
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670	Payment Levy	11-24-2021	-\$251,061.82
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670	Payment Levy	12-08-2021	-\$1,998,402.54
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670	Payment Levy	12-08-2021	-\$46,462.18
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670	Payment Levy	12-15-2021	-\$1,000,041.54
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670	Payment Levy	12-15-2021	-\$21,500.89
670	Payment Levy	12-22-2021	-\$45,981.54
670	Payment Levy	12-22-2021	-\$518,552.14
670	Payment Levy	01-19-2022	-\$623,432.28

670	Payment Levy	02-18-2022	-\$630,746.27
670	Payment Levy	03-23-2022	-\$630,746.28

670	Payment Levy	04-11-2022	-\$630,746.28
670	Payment Levy	05-06-2022	-\$27,020,546.54
670	Payment Levy	05-18-2022	-\$630,746.27
670	Payment Levy	05-25-2022	-\$3,332.80
670	Payment Levy	05-26-2022	-\$169,816.50
670	Payment Levy	06-16-2022	-\$1,250.17
670	Payment Levy	06-22-2022	-\$630,746.28
670	Payment Levy	06-23-2022	-\$3,332.80

670	Payment Levy	07 14 2022	\$16,588 05
670	Payment Levy	07 19 2022	\$630,746 28
670	Payment Levy	07 26 2022	\$3,332 80

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